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November 12, 2019

## VIA ECF

The Honorable P. Kevin Castel United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Saint Clair, 19 CR 790 (PKC)

## Dear Judge Castel:

I represent Asa Saint Clair pursuant to the above-captioned case. As the Court is aware, this case is on for Mr. Saint Clair's arraignment tomorrow. I write this letter on behalf of all parties to request a modification to the current bond. The current bond, set by Magistrate Judge Wang, is \$500,000.00 to be secured by two financially responsible people. I have provided the information and financial documents for two financially responsible people who have been interviewed by the U.S. Attorney's Office. The Government has indicated that these two potential signers would be acceptable to sign the bond. However, the Government would like a condition added whereby one of signers also agrees to allow for the forfeiture of his home should Mr. Saint Clair violate the terms of his release. This request arises because neither potential signer has adequate financial liquidity to cover the amount of the bond without the property.

I have no objection to this extra condition and have provided documents to the Government reflecting the value of the proposed property as well as the remaining mortgage amount. The amount of equity in the home coupled with the salaries of the two potential signers is in excess of \$500,000.00. I have given the Government documents reflecting this and they indicated they would approve it. I therefore write this letter requesting an Order from the Court that the bond be modified to include this extra provision. This request is without objection.

Respectfully Submitted,

John P. Buza

AUSA Kiersten Fletcher via ECF

cc: